

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #1

DATED: April 12, 2002

ITEM: AL-VZ 1-4 Please refer to page 17 of Verizon's Panel Testimony where the witnesses lay out five different security methods for providing access to CLECs to collocated space and shared facilities.

- (a) For each CO where collocation occurs, please indicate which of the five security methods are employed. For each such CO, please explain why a particular security measure or combination of measures has been chosen.
- (b) Has Verizon developed criteria for determining which of the five stated security measures should be employed at a CO? If so, please provide a list of these criteria.

**SUPPLEMENTAL
REPLY:**

- (a) As stated in Verizon MA's original Reply to AL-VZ-1-4, Verizon MA requires that all non-Verizon employees use authorized ID cards or credentials for entry to Verizon COs. All Verizon MA's COs are also locked and are accessible by key locks or card readers. See also Verizon MA's Replies to Qwest 1-20 and 1-21 for a list of COs where electronic card reader systems ("CRAS") are currently and planned for deployment in 2002. Verizon MA's long-range plans are to roll out CRAS in its collocated COs. Likewise, as stated in Verizon MA's original Reply to AL-VZ-1-4, the Company's COs contain appropriate signage, *e.g.*, masking tape on the floor, to mark secured and separate means of ingress and egress for collocated carriers. Finally, the following Verizon MA COs have assigned security guards:

8 Harrison Ave, Boston
41 Belvidere St, Boston
6 Bowdoin St, Boston

185 Franklin St, Boston
10 Ware St, Cambridge

-2-

**SUPPLEMENTAL
REPLY TO
AL-VZ 1-4
(CONT'D):**

210 Bent St, Cambridge
26 Waverly St, Roxbury

Security guards are utilized in these COs primarily because of the volume of employees from various departments historically working at those Company locations. As indicated in Verizon MA's Replies to AL-VZ 1-4, AL-VZ 1-1 (c) and (g), although security guards may not be assigned to other Massachusetts COs, Verizon technicians are present in the collocated COs.

(b) See (a) above.

VZ # 22S

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #1

DATED: April 12, 2002

ITEM: AL-VZ 1-20 Please refer to page 39 of Verizon's Panel Testimony where the witnesses state that Verizon proposes to convert certain "critical" CO sites to sites that would provide virtual collocation only, even if physical collocation space were otherwise available.

- (a) Please discuss how Verizon proposes to "work with the Department" to identify these "critical" sites. Is Verizon proposing to work with the Department to identify such sites outside of an adjudicatory or other regulatory review process where CLECs and other entities can present testimony or comment on issues related to identification and conversion of such sites?
- (b) With respect to the first "key factor" currently identified by Verizon for determining which COs might be selected as "critical", please explain what types of switches or signaling elements housed in a CO would qualify that CO for "critical" status under Verizon's proposal.
- (c) With respect to the second "key factor" identified by Verizon for determining which COs might be selected as critical, please identify which airports, military installations, government agencies and nuclear power plants in Massachusetts would qualify as "critical customers" under Verizon's proposal. For each such "critical customer", please identify the associated CO or COs that would qualify as "critical" for purposes of serving that customer.
- (d) With respect to the third "key factor" identified by Verizon for determining which COs might be selected as critical, please indicate what specific number of access lines and/or special services circuits

would operate as a threshold for determining

-2-

which COs are “critical”. For each CO where collocation occurs, please provide the number of access lines and special services circuits.

- (e) If it is the case that Verizon proposes that the three key factors for determining which COs might be selected as “critical” are to be applied interactively, please explain how Verizon would apply these three factors interactively to determine whether a CO is critical.

**SUPPLEMENTAL
REPLY:**

- a. Verizon MA has not developed a plan for how the Department will determine which central offices are to be designated as “critical.” Should the Department adopt Verizon MA’s proposal, the Department will then decide the appropriate forum in which to determine those central offices that would be considered “critical” based on the sensitive nature of the information being evaluated.

VZ # 38S

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #1

DATED: April 12, 2002

ITEM: AL-VZ 1-21 For each CO in which Verizon maintains that CLEC equipment would have to be relocated in order to ensure the security of Verizon equipment, please indicate (a) whether all or some relocated CLEC equipment would remain in the CO building, (b) if any equipment would be moved out of the CO building, where it would be moved; (c) the distance between the closest relocated CLEC equipment and Verizon equipment; and (d) the approximate cost to implement the move, including the cost to prepare the separate space and to move the equipment.

**SUPPLEMENTAL
REPLY:**

a. Not applicable since no CLEC equipment would need to be relocated. As stated in Verizon MA's Replies to Conversent 1-20 and Allegiance 1-9, the only Massachusetts CO where existing physical collocation arrangements are not located in separate and secure space is the Hopkinton CO. To secure Verizon MA's facilities in that CO, the unsecured CLEC physical collocation equipment in that cageless (CCOE) arrangement would need to be moved to a secured space within the central office, if available, or converted to a virtual collocation arrangement. Because no secured space is available at that CO, that CCOE would be converted to virtual collocation under Verizon MA's proposed security plan. Likewise, should the Department adopt Verizon MA's proposal and designate certain COs as "critical," all physical collocation arrangements in those COs would be converted to virtual collocation arrangements. As Verizon MA indicated in its Panel Testimony (pp. 40-41), the Company would endeavor to convert "in-place," thereby minimizing the costs to CLECs.

b. See Verizon MA's Reply to (a) above.

**SUPPLEMENTAL
REPLY TO
AL-VZ 1-21:
(CONT'D.)**

-2-

- c. See Verizon MA's Reply to (a) above.
- d. See Verizon MA's Replies to (a) above and to XO Communications 1-6.

VZ # 39S

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #1

DATED: April 12, 2002

ITEM: AL-VZ 1-24 Since September 11, 2001, has Verizon undertaken a review of the security plans that cover its Massachusetts central offices to identify measures that would enhance the protection of those facilities from intentional or accidental damage of any origin? If so, which, if any, additional security measures have been implemented? Have any potential measures that were identified not been implemented and, if not, why not? Were any potential additional security measures rejected or not implemented because their cost would outweigh the benefits that the measures would bring? What criteria did Verizon apply in determining whether a particular measure should be implemented? What criteria did Verizon apply in determining whether a particular measure was cost-justified, if cost was a factor at all in its decision-making?

**SUPPLEMENTAL
REPLY:** Verizon MA reviewed its security procedures post September 11th, and adopted additional security measures in Massachusetts, as described in its original Reply to AL-VZ 1-24. No potential security measures were identified, but not implemented. Thus, there is no cost/benefit analysis for rejecting any potential measures. The overriding concern at that time was the need to protect the network infrastructure, and the additional security measures adopted were intended to meet that objective.

VZ # 42S